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July 20, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Thursday, July 19, 2012, John Nakahata and Kasey Chow, on behalf of FedLink Wireless, LLC ("FedLink"), as well as Thomas Adair and Jenny Tadlock, President and Executive Assistant to the President, respectively, of FedLink spoke with Kimberly Scardino, Divya Shenoy, Alexander Minard, and Jonathan Lechter of the Telecommunications Access Policy Division. We discussed FedLink's Compliance Plan as originally filed on April 9, 2012.

John Nakahata gave a brief introduction and overview of the Company. Thomas Adair elaborated on the Company, its current operations, its financial and technical capability to provide Lifeline service, and its commitment to provide quality customer care. Jenny Tadlock elaborated on the Company's enrollment procedures.

We discussed FedLink's affiliate Fast Phones, Inc. and Thomas Adair's extensive experience in the telecommunications industry, particularly wireline retail and wireline Lifeline provision. We also discussed FedLink's commitment to abide by all FCC regulations, especially those regarding Lifeline customer eligibility, certifications and annual re-certifications.

Finally, FedLink agreed to file a revised Compliance Plan with all suggested changes and additions. Attached is a copy of the presentation deck that was provided at the meeting yesterday.

Ms. Marlene H. Dortch

July 20, 2012

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Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ KASEY CHOW

Kasey C. Chow

Associate to Lance J.M. Steinhart

Attorney for FedLink Wireless, LLC

Attachments

cc: Thomas Adair
Jenny Tadlock
John Nakahata
Kimberly Scardino
Divya Shenoy
Alexander Minard
Jonathan Lechter

FedLink Wireless, LLC

Federal Communications Commission

July 19, 2012



Agenda

- *Introduction to FedLink Wireless, LLC*
- *Financial Capability*
- *Technical Capability*
- *FedLink's Lifeline Plans*
- *Marketing / Advertising Plan*
- *Enrolling Lifeline Customers*
- *Recertifying Lifeline Customers*
- *Preventing Waste, Fraud & Abuse*
- *Q & A*



FedLink Wireless, LLC

Names and Identifiers used by FedLink Wireless, LLC:

- FedLink Wireless
- FedLink



FedLink Wireless, LLC

In compliance with newly amended section 54.202, FedLink certifies:

- It will comply with the service requirements applicable to the support that it receives;
- It has the ability to remain functional in emergency situations;
- It will satisfy applicable consumer protection and service quality standards; and
- It is financially and technically capable of providing the Lifeline service.



Financial Capability

FedLink is financially capable of providing the supported Lifeline service:

- Financial Resources
- Affiliates
- FedLink plans to simultaneously launch both Lifeline and non-Lifeline wireless services after FCC Compliance Plan approval and receipt of ETC designations



Technical Capability

FedLink is technically capable of providing the supported Lifeline service :

- Key Management Experience
 - **Thomas Adair** – 15+ yrs in telecom business/management
 - Other key management personnel



FedLink Lifeline Plans

FedLink proposes a choice between two (2) Lifeline plans:

- 100 Monthly Minutes
- 250 Monthly Minutes

All plans include:

- Free handset
- Free calls to 911 Emergency Services
- Free calls to Customer Service
- Free Voicemail, Caller ID, and Call Waiting
- Free Domestic Long Distance



FedLink Lifeline Plans

100 Monthly Minutes

FREE

100 Anytime Minutes

Minutes Rollover

3 texts = 1 minute

250 Monthly Minutes

FREE

250 Anytime Minutes

Minutes DO NOT Rollover

No Texting



FedLink Lifeline Plans

Public Safety and 911 / E911 Access:

- FedLink will ensure that all handsets used in connection with its Lifeline service are E911-compliant.
- FedLink will provide its Lifeline customers with access to 911 and E911 services:
 - through its underlying carrier, Sprint
 - at the time of Lifeline service initiation
 - regardless of activation status and minute availability



FedLink Marketing / Advertising Plan

All materials will comply with disclosure requirements:

- Disclose company name under which it does business;
- Explain in clear, easily understood language the following:
 - ✓ Only eligible consumer may enroll in the program;
 - ✓ What documentation is necessary for enrollment;
 - ✓ The program is limited to one benefit per household, consisting of either wireline or wireless service;
 - ✓ Lifeline is a government benefit program; and
 - ✓ Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.




FedLink Marketing / Advertising Plan

FedLink intends to market its Lifeline service via:

- Community Events
- TV / Radio spots
- Direct mail
- Flyers / Brochures

FREE Cell Phone & Minutes
NO CONTRACTS • NO CREDIT CHECK • NO FEES



You may qualify if you participate in programs like Food Stamps and Medicaid . For additional eligibility programs and to get your phone **FASTER** go to www.FedLinkWireless.com NOW!

FedLink Wireless, LLC • 888-943-3354
www.FedLinkWireless.com



Enrolling Lifeline Customers

Eligibility Confirmation:

1. Confirm prospect's identity (see government issued picture ID)
2. Confirm program or income eligibility (see proof)
3. Confirm valid household address and whether permanent/temporary or multi-household (validate w/USPS)
4. Confirm prospect not currently receiving subsidy (ask prospect, perform duplicate check into an internal and pooled external database)
5. Confirm that eligible party has received the handset and has used it prior to seeking reimbursement



Enrolling Lifeline Customers

End-User Education and Disclosures:

- Lifeline is a federal non-transferable benefit
- Lifeline service is available for only one line per household
- A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
- Households are NOT permitted to receive benefits from multiple providers
- Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government





Recertifying Lifeline Customers

Annual Recertification Compliance:

- FedLink commits to re-certify the eligibility of all Lifeline customers and report the results to USAC. Because it has not launched, FedLink has no customers as of June 1, 2012.
- After 2012, FedLink will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
- All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
- In addition, FedLink will continue to follow any state-specific requirements.



Preventing Waste, Fraud & Abuse

- FedLink utilizes a diligent Enrollment Process
- FedLink's business model primarily employs direct, in-store or over the phone/internet, high quality contact and customer service
- FedLink will not seek reimbursement until a customer has personally activated service (by initiation and/or usage)
- FedLink has a 60-day non-usage policy
- FedLink emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, representative training, process documentation, non-usage/de-enrollment procedures



Preventing Waste, Fraud & Abuse

Additional Measures to prevent waste, fraud & abuse:

- Duplicates Database
 - Pooled External Database (CGM, LLC)
 - National Database, when in place
- Provide customer data to PUCs, FCC, and USAC
- Independent Biennial Audits*
 - *if FedLink draws \$5 million+ on an annual basis



QUESTIONS?

